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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARDO FLORES BELTRAN, and
SANDRO ESCOBEDO,

Defendants.

CASE NO. 2:21-CR-0007-DAD

STIPULATION AND ORDER TO CONTINUE
MOTIONS HEARING AND BRIEFING
SCHEDULE

STIPULATION

By this stipulation, Plaintiff, the United States of America, by and through its attorney of record, Assistant U.S. Attorney David W. Spencer, and Defendants Leonardo Flores Beltran and Sandro Escobedo, by and through their attorneys of record, hereby request to continue the motions hearing set for February 3, 2025, and the accompanying briefing schedule, as follows:

1. On December 12, 2024, defendant Rosario Zamora Rojo filed a pre-trial motion to suppress wiretap evidence, which defendants Sandro Escobedo and Leonardo Flores Beltran joined. *See* ECF 592 (motion), ECF 602 (Escobedo joinder), ECF 603 (Flores Beltran joinder).
2. By stipulation, the motions hearing was set for February 3, 2025, with the government's opposition due on January 20, 2025, and reply briefs due on January 27, 2025. ECF 606.

3. On January 13, 2025, defendant Zamora Rojo pled guilty and the February 3, 2025, motions hearing was vacated as to defendant Zamora Rojo. ECF 610.
4. The parties have been engaged in plea discussions and believe they are close to finalizing an anticipated resolution. If resolution is reached, the parties anticipate requesting a change of plea hearing on February 3, 2025, or, at the latest, February 10, 2025.
5. The parties hereby jointly stipulate and request that the February 3, 2025, hearing on defendants' pretrial motions (ECF 592, 602, and 603) shall be continued to February 10, 2025. The parties further stipulate and request that the government's oppositions shall be due on January 27, 2025, and any replies shall be due on February 3, 2025.¹

IT IS SO STIPULATED.

Dated: January 14, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

Dated: January 14, 2025

/s/ Christopher Cosca
Christopher Cosca
Counsel for Defendant
LEONARDO FLORES BELTRAN

Dated: January 14, 2025

/s/ Michael Heumann
Michael Heumann
Counsel for Defendant
SANDRO ESCOBEDO

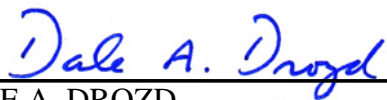
¹ By agreeing to this briefing schedule, the government does not waive, and explicitly preserves its position that defendants' motions are untimely and should be denied on that basis alone. The Court ordered all pretrial motions to be filed by November 19, 2024. ECF 506. As the government will further argue in its opposition briefing, its position is that the defendants have not shown good cause for the untimely filing of their pretrial motions, and thus the motions should be summarily denied. *See* Fed. R. Crim. P. 12(c).

ORDER

The motions hearing set for February 3, 2025, at 9:30 a.m., for the motions docketed at ECF 592, 602, and 603, is hereby continued to February 10, 2025 at 9:30 a.m. The government's oppositions shall be due on January 27, 2025, and any replies shall be due on February 3, 2025.

IT IS SO ORDERED.

Dated: January 15, 2025



DALE A. DROZD
UNITED STATES DISTRICT JUDGE